

REMARKS

Claims 24, 26-31, 33-44 and 46-54 were examined and reported in the Office Action. Claims 24, 26-31, 33-44 and 46-54 are rejected. Claims 24, 27-28, 30, 34-35 and 43 are amended. Claims 24, 26-31, 33-44 and 46-54 remain.

Applicant requests reconsideration of the application in view of the following remarks.

I. Claim Objections

It is asserted in the Office Action that claims 27, 28, 34 and 35 are objected to for being dependent on a canceled claim. Applicant has amended claims 27, 28, 34 and 35 to correct the dependency and overcome the informal objections.

Accordingly, withdrawal of the objections for claims 27, 28, 34 and 35 is respectfully requested.

II. 35 U.S.C. § 103(a)

A. It is asserted in the Office Action that claims 24, 26, 28-30, 33-38, 40, 43, 46-50 are rejected in the Office Action under 35 U.S.C. § 103(a) as being obvious over U. S. Patent No. 6,141,760 issued to Abadi et al ("Abadi") in view of U.S. Patent No. 6,826,686 issued to Peyravian et al. ("Peyravian "). Applicant respectfully traverses the aforementioned rejection for the following reasons.

According to MPEP §2142

[t]o establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant's

disclosure. (*In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991)).

Further, according to MPEP §2143.03, “[t]o establish prima facie obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. (*In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974).” “*All words in a claim must be considered in judging the patentability of that claim against the prior art.*” (*In re Wilson*, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970), emphasis added.)

Applicant’s amended claim 24 contains the limitations of

receiving a user password; receiving a user identification; receiving a name of an independent software application that requires a password for a user to use the software application; determining a specific randomly generated salt value only associated with the software application; computing a software application dependent password for a user, wherein the software application dependent password is a hash of the user password, the user identification and the randomly generated salt value for the software application, and the hash is reiterated a plurality of times; and returning the software application dependent password to the software application, wherein a user does not need to one of remember the software application dependent password and record the software application dependent password as the software application dependent password is one of computed each time a user requests access to the software application and temporarily stored a first time the user requests access to the software application for a predetermined time period.

Applicant’s amended claim 30 contains the limitations of

hashing a particular randomly generated salt value associated with a specific software application and input data a plurality of times to generate a hash, the input data including a user identification and a strong password; generating a password from the hash; and returning the password to the software application to gain entry to the software application, wherein a user does not need to one of remember the software application dependent password and record the software application dependent password as the software application dependent password is one of

computed each time a user requests access to the specific software application and temporarily stored a first time the user requests access to the specific software application for a predetermined time period.

Applicant's amended claim 43 contains the limitations of

hashing a particular randomly generated salt value associated with a specific software application and input data a plurality of times to generate a hash, the input data including a user identification and a strong password; generate a password from the hash; and return the password to a user to gain entry to the software application, wherein the user does not need to one of remember the software application dependent password and record the software application dependent password as the software application dependent password is generated each time a user requests access to the specific software application.

Abadi discloses generating passwords for password controlled access points. Abadi uses a master password, an access password and a username. The master password, service name and user name are combined using an irreversible function, e.g., a hash function, to generate a unique password. Abadi, however, does not teach, disclose or suggest

the software application dependent password is a hash of the user password, the user identification and the randomly generated salt value for the software application, and the hash is reiterated a plurality of times; and returning the software application dependent password to the software application,

or

hashing a particular randomly generated salt value associated with a specific software application and input data a plurality of times to generate a hash, the input data including a user identification and a strong password; generating a password from the hash; and returning the password to the software application to gain entry to the software application.

Peyravian discloses a secure method of changing a password when the password is being transmitted over untrusted networks. Peyravian uses a collision-resistant hash function. Peyravian, however, does not teach, disclose or suggest

the software application dependent password is a hash of the user password, the user identification and the randomly generated salt value for the software application, and the hash is reiterated a plurality of times; and returning the software application dependent password to the software application.

or

hashing a particular randomly generated salt value associated with a specific software application and input data a plurality of times to generate a hash, the input data including a user identification and a strong password; generating a password from the hash; and returning the password to the software application to gain entry to the software application.

Therefore, even if Abadi were combined with Peyravian, the resulting invention would still not include all of Applicant's claimed limitations. And, therefore, there would be no motivation to combine Abadi with Peyravian. Moreover, by viewing the disclosures of Abadi and Peyravian, one can not jump to the conclusion of obviousness without impermissible hindsight. According to MPEP 2142,

[t]o reach a proper determination under 35 U.S.C. 103, the examiner must step backward in time and into the shoes worn by the hypothetical 'person of ordinary skill in the art' when the invention was unknown and just before it was made. In view of all factual information, the examiner must then make a determination whether the claimed invention 'as a whole' would have been obvious at that time to that person. Knowledge of applicant's disclosure must be put aside in reaching this determination, yet kept in mind in order to determine the 'differences,' conduct the search and evaluate the 'subject matter as a whole' of the invention. The tendency to resort to 'hindsight' based upon applicant's disclosure is often difficult to avoid due to the very nature of the examination process. However, impermissible hindsight

must be avoided and the legal conclusion must be reached on the basis of the facts gleaned from the prior art.

Applicant submits that without first reviewing Applicant's disclosure, no thought, whatsoever, would have been made to

hashing a particular randomly generated salt value associated with a specific software application and input data a plurality of times to generate a hash, the input data including a user identification and a strong password; generating a password from the hash; and returning the password to the software application to gain entry to the software application.

Neither Abadi, Peyravian, and therefore, nor the combination of the two, teach, disclose or suggest the limitations contained in Applicant's amended claims 24, 30 and 43, as listed above. Since neither Abadi, Peyravian, nor the combination of the two, teach, disclose or suggest all the limitations of Applicant's amended claims 24, 30 and 43, Applicant's amended claims 24, 30 and 43 are not obvious over Abadi in view of Peyravian since a *prima facie* case of obviousness has not been met under MPEP §2142. Additionally, the claims that directly or indirectly depend from amended claims 24, 30 and 43, namely claims 26 and 28-29, 31-38 and 40, and 46-50, respectively, would also not be obvious over Abadi in view of Peyravian for the same reason.

Accordingly, withdrawal of the 35 U.S.C. § 103(a) rejection for claims 24, 26, 28-30, 33-38, 40, 43, 46-50 is respectfully requested.

B. It is asserted in the Office Action that claim 27 is rejected in the Office Action under 35 U.S.C. § 103(a) as being unpatentable over Abadi in view of Peyravian, and further in view of U. S. Patent No. 5,719,941 issued to Swift et al ("Swift"). Applicant respectfully traverses the aforementioned rejection for the following reasons.

Applicant's claim 27 directly depends on amended claim 24. As discussed above in section II(A), neither Abadi, Peyravian, and therefore, nor the combination of the two teach, disclose or suggest Applicant's claim 24 limitations of

the software application dependent password is a hash of the user password, the user identification and the randomly

generated salt value for the software application, and the hash is reiterated a plurality of times; and returning the software application dependent password to the software application

Swift discloses a secure method for changing a password in a network environment. Swift, however, does not teach, disclose or suggest Applicant's claim 24 limitations of

the software application dependent password is a hash of the user password, the user identification and the randomly generated salt value for the software application, and the hash is reiterated a plurality of times; and returning the software application dependent password to the software application

Neither Abadi, Peyravian, Swift, and therefore, nor the combination of the three, teach, disclose or suggest the limitations contained in Applicant's amended claim 24, as listed above. Since neither Abadi, Peyravian, Swift, and therefore, nor the combination of the three, teach, disclose or suggest all the limitations of Applicant's amended claim 24, Applicant's amended claim 24 is not obvious over Abadi in view of Peyravian and Swift since a *prima facie* case of obviousness has not been met under MPEP §2142. Additionally, the claim that directly depends from amended claim 24, namely claim 27, would also not be obvious over Abadi in view of Peyravian and Swift for the same reason.

Accordingly, withdrawal of the 35 U.S.C. § 103(a) rejection for claim 27 is respectfully requested.

C. It is asserted in the Office Action that claims 31 and 44 are rejected in the Office Action under 35 U.S.C. § 103(a) as being obvious over Abadi in view of Peyravian, and further in view of U. S. Patent No. 6,006,333 issued to Nielsen ("Nielsen"). Applicant respectfully traverses the aforementioned rejection for the following reasons.

Applicant's claim 31 directly depends on amended claim 30. Applicant's claim 44 directly depends on amended claim 43. As discussed above in section II(A), neither Abadi, Peyravian, and therefore, nor the combination of the two teach, disclose or suggest Applicant's claims 30 and 43 limitations of

hashing a particular randomly generated salt value associated with a specific software application and input data a plurality of times to generate a hash, the input data including a user identification and a strong password; generating a password from the hash; and returning the password to the software application to gain entry to the software application.

Nielson discloses a system for maintaining passwords for different applications. Nielson, however, does not teach, disclose or suggest Applicant's claim 30 and 43 limitations of

hashing a particular randomly generated salt value associated with a specific software application and input data a plurality of times to generate a hash, the input data including a user identification and a strong password; generating a password from the hash; and returning the password to the software application to gain entry to the software application.

Neither Abadi, Peyravian, Nielson, and therefore, nor the combination of the three, teach, disclose or suggest the limitations contained in Applicant's amended claims 30 and 43, as listed above. Since neither Abadi, Peyravian, Nielson, and therefore, nor the combination of the three, teach, disclose or suggest all the limitations of Applicant's amended claim 30 and 43, Applicant's amended claims 30 and 43 are not obvious over Abadi in view of Peyravian and Nielson since a *prima facie* case of obviousness has not been met under MPEP §2142. Additionally, the claims that directly depend from amended claims 30 and 43, namely claims 31, and 43, respectively, would also not be obvious over Abadi in view of Peyravian and Nielson for the same reason.

Accordingly, withdrawal of the 35 U.S.C. § 103(a) rejection for claims 31 and 44 is respectfully requested.

D. It is asserted in the Office Action that claims 39 and 51 are rejected in the Office Action under 35 U.S.C. § 103(a) as being obvious over Abadi in view of Peyravian, and further in view of U.S. Patent Application No. 6,064,736 issued to Davis et al. ("Davis"). Applicant respectfully traverses the aforementioned rejection for the following reasons.

Applicant's claim 39 directly depends on amended claim 30. Applicant's claim 51 directly depends on amended claim 43. As discussed above in section II(A), neither Abadi, Peyravian, and therefore, nor the combination of the two teach, disclose or suggest Applicant's claims 30 and 43 limitations of

hashing a particular randomly generated salt value associated with a specific software application and input data a plurality of times to generate a hash, the input data including a user identification and a strong password; generating a password from the hash; and returning the password to the software application to gain entry to the software application.

Davis discloses using a MD5 algorithm. Davis, however, does not teach, disclose or suggest Applicant's claim 30 and 43 limitations of

hashing a particular randomly generated salt value associated with a specific software application and input data a plurality of times to generate a hash, the input data including a user identification and a strong password; generating a password from the hash; and returning the password to the software application to gain entry to the software application.

Neither Abadi, Peyravian, Davis, and therefore, nor the combination of the three, teach, disclose or suggest the limitations contained in Applicant's amended claims 30 and 43, as listed above. Since neither Abadi, Peyravian, Davis, and therefore, nor the combination of the three, teach, disclose or suggest all the limitations of Applicant's amended claim 30 and 43, Applicant's amended claims 30 and 43 are not obvious over Abadi in view of Peyravian and Davis since a *prima facie* case of obviousness has not been met under MPEP §2142. Additionally, the claims that directly depend from amended claims 30 and 43, namely claims 39, and 51, respectively, would also not be obvious over Abadi in view of Peyravian and Davis for the same reason.

Accordingly, withdrawal of the 35 U.S.C. § 103(a) rejections for claims 39 and 51 and 52-54 are respectfully requested.

E. It is asserted in the Office Action that claims 41, 42, 53, and 54 are rejected in the Office Action under 35 U.S.C. § 103(a) as being unpatentable over Abadi in view of

Peyravian, and further in view of U.S. Patent No. 6,601,175 issued to Arnold et al ("Arnold"). Applicant respectfully traverses the aforementioned rejection for the following reasons.

Applicant's claims 4 and 421 indirectly depend on amended claim 30. Applicant's claims 53 and 54 indirectly depend on amended claim 43. As discussed above in section II(A), neither Abadi, Peyravian, and therefore, nor the combination of the two teach, disclose or suggest Applicant's claims 30 and 43 limitations of

hashing a particular randomly generated salt value associated with a specific software application and input data a plurality of times to generate a hash, the input data including a user identification and a strong password; generating a password from the hash; and returning the password to the software application to gain entry to the software application.

Arnold discloses password protection for data processing systems through the use of limited-use machine-specific passwords. Arnold, however, does not teach, disclose or suggest Applicant's claim 30 and 43 limitations of

hashing a particular randomly generated salt value associated with a specific software application and input data a plurality of times to generate a hash, the input data including a user identification and a strong password; generating a password from the hash; and returning the password to the software application to gain entry to the software application.

Neither Abadi, Peyravian, Arnold, and therefore, nor the combination of the three, teach, disclose or suggest the limitations contained in Applicant's amended claims 30 and 43, as listed above. Since neither Abadi, Peyravian, Arnold, and therefore, nor the combination of the three, teach, disclose or suggest all the limitations of Applicant's amended claim 30 and 43, Applicant's amended claims 30 and 43 are not obvious over Abadi in view of Peyravian and Arnold since a *prima facie* case of obviousness has not been met under MPEP §2142. Additionally, the claims that directly depend from amended claims 30 and 43, namely claims 41-42, and 53-54, respectively,

would also not be obvious over Abadi in view of Peyravian and Arnold for the same reason.

Accordingly, withdrawal of the 35 U.S.C. § 103(a) rejections for claims 41, 42, 53, and 54 are respectfully requested.

CONCLUSION

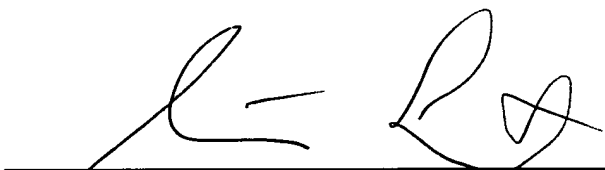
In view of the foregoing, it is submitted that claims 24, 26-31, 33-44 and 46-54 patentably define the subject invention over the cited references of record, and are in condition for allowance and such action is earnestly solicited at the earliest possible date. If the Examiner believes a telephone conference would be useful in moving the case forward, he is encouraged to contact the undersigned at (310) 207-3800.

If necessary, the Commissioner is hereby authorized in this, concurrent and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2666 for any additional fees required under 37 C.F.R. §§1.16 or 1.17, particularly, extension of time fees.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR, & ZAFMAN LLP

Dated: December 15, 2005

By: 
Steven Laut, Reg. No. 47,736

12400 Wilshire Boulevard
Seventh Floor
Los Angeles, California 90025
(310) 207-3800

CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail with sufficient postage in an envelope addressed to: Mail Stop Amendment, Commissioner for Patents, P. O. Box 1450, Alexandria, Virginia 22313-1450 on December 15, 2005.


Jean Svoboda